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ILLINOIS COMMERCE COMMISSION

CHIEF CLERK'S OFFICE

COMMONWEALTH EDISON COMPANY)

Petition for expedited approval of implementation)
of a market-based alternative tariff, to become)
effective on or before May 1, 2000,)
pursuant to Article IX and Section 16-112)
of the Public Utilities Act.)

Docket No. 00- 0259

**UNICOM ENERGY INC.'S
COMMENTS IN SUPPORT OF COMED'S PETITION**

Following three comprehensive workshops in February and March of this year, Commonwealth Edison Company ("ComEd") filed a petition, on March 30, 2000, seeking approval of tariffs that would replace the neutral fact-finder ("NFF") process for calculating the market value of energy. The proposed tariffs implement a new valuation methodology that is keyed to publicly available price data. On April 13, the Hearing Examiner issued a scheduling order in the case requiring parties to file comments or statements of position in response to the petition by April 18. Pursuant to that order, Unicom Energy, Inc. (UEI), by its attorneys, Gardner, Carton & Douglas, submits the following comments in support of ComEd's petition and proposed tariffs.

**The Commission Should Quickly Approve
ComEd's Tariff Petition And Its Wholesale Offer**

ComEd's proposed tariffs represent a welcome alternative to the ("NFF") process for establishing market values under Section 16-112 of the Public Utilities Act (220 ILCS 5/16-112). By linking the market value of energy to actual market-based price data, the proposed tariffs allow alternative retail electric suppliers, like UEI, to better forecast and anticipate the market

value of energy. Better predictive judgments about the market value of energy, in turn, will create sharper competition for energy customers. Second, ComEd's transitional offer to supply wholesale power and energy at the values established by the NFF and under its new methodology is a key component of the proposal. The wholesale offer will establish confidence in the marketplace for the new pricing methodology. UEI supports the tariff petition.

Time, however, is of the essence. April and May are peak marketing months for energy suppliers. Since the first workshop on alternatives to the NFF process in February of this year, UEI and its customers have faced uncertainty over which methodology will establish market values for the coming summer months. Accordingly, UEI respectfully requests that the Commission resist any effort to delay approval of the tariffs and, no later than April 27, 2000, approve ComEd's proposed tariffs and find that ComEd's wholesale offer is just and reasonable and will promote the development of an effectively competitive electricity market that operates efficiently and is equitable to all consumers.

Respectfully submitted,

UNICOM ENERGY, INC.

By: 
One of its attorneys

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NOTICE OF FILING

TO: Persons on the Attached Service List

PLEASE TAKE NOTICE that on April 18, 2000, we have filed by e-mail and Federal Express with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701, Unicom Energy, Inc.'s Comments In Support of ComEd's Petition.

DATED: April 18, 2000

By: 

Attorney for Unicom Energy, Inc.

CERTIFICATE OF SERVICE

I Daniel D. McDevitt hereby certify that on this day I served Unicom Energy, Inc.'s
Comments In Support of ComEd's Petition upon the persons listed on the attached service list by
email and first class mail on this 18th day of April, 2000.

A handwritten signature in black ink, appearing to be 'DDM', is written over a horizontal line.

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON

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Docket No. 00-0259

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